

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: §
GALLERIA 2425 Owner, LLC § Case No. 23-34815 (JPN)
Debtor. § Chapter 11
§

**WITNESS AND EXHIBIT LIST FOR DECEMBER 5, 2024 EMERGENCY HEARING
ON NBK'S EMERGENCY MOTIONS TO ENFORCE SALE ORDER
(Related to ECF No. 838 and ECF No. 839)**

National Bank of Kuwait, S.A.K.P., New York Branch (“NBK”) and Houston 2425 Galleria, LLC (“NBK’s Assignee”), file this Witness and Exhibit List for the emergency hearing to be held December 5, 2024 at 9:00 a.m. (prevailing Central Time) (the “Hearing”) on (1) NBK’s (Renewed) Emergency Motion to Enforce Sale Order (Jetall Companies, Inc.) (ECF No. 838) and (2) NBK’s Second Emergency Motion to Enforce Sale Order (2425 WL, LLC) (ECF No. 839).

WITNESS LIST

NBK and/or NBK’s Assignee may call the following witnesses at the Hearing:

1. Christopher R. Murray, Liquidating Trustee.
2. Lisa Skelton, Vice President & Senior General Manager, JLL.
3. Eric Nelson, Managing Director, Spaulding & Slye Investments.
4. Any witness called by any other party.
5. Any witness(es) necessary to rebut the testimony of any witness(es) called or designated by any other party.

EXHIBIT LIST

Exhibit	Description	Offer	Object	Admit	Disposition
1.	Order Denying Motion to Prohibit Credit Bidding; ECF No. 535				
2-A.	Order Confirming Chapter 11 Plan of Liquidation of the Debtor; ECF No. 566				
2-B.	Memorandum Opinion; ECF No. 565				
3.	Order Granting Defendant's Renewed Motion to Dismiss Complaint for Equitable Subordination and Damages; ECF No. 18; Adversary No. 24-03043				
4.	Order Dismissing Case; ECF No. 25; Adversary No. 24-3120 (case originally filed as <i>Ali Choudhri v. National Bank of Kuwait, S.A.K.P., New York Branch</i> , Cause No. 2024-27168 in the 129th Judicial District Court of Harris County, removed to bankruptcy court June 7, 2024)				
5.	Appellant's Response in Opposition to Motion to Dismiss Appeal; ECF No. 9; Case No. 24-2590 (2425 WL, LLC's appeal of the Confirmation Order)				
6.	Defendant Jetall Companies, Inc.'s First Amended and Supplemental Answer to Plaintiff's Petition; Case No. 241100353166; Houston 2425 <i>Galleria LLC v. Jetall Companies, Inc.</i> ; In the Justice Court, Precinct 1, Place 1, Harris County, Texas				
7.	Eviction – Judgment/Dismissal Order NonJury; Case No. 241100353166; <i>Houston 2425 Galleria LLC v. Jetall Companies, Inc.</i> ; In the Justice Court, Precinct 1, Place 1, Harris County, Texas				
8-A.	Debtor's Schedules and SOFA; ECF No. 70				
8-B.	List of Equity Security Holders; ECF No. 76				
9.	Declaration of Ali Choudhri in Support of Cash Collateral Motion and Motion to Determine Adequate Assurance Utility Payment; ECF No. 43-3				
10-A.	Transcript of Hearing on Motion to Prohibit Credit Bid (June 17, 2024)				

Exhibit	Description	Offer	Object	Admit	Disposition
10-B.	Transcript of Confirmation Hearing (June 19, 2024)				
10-C.	Transcript of Sale Hearing (July 8, 2024)				
11.	Chapter 11 Trustee's Motion for Entry of an Order: (I) Approving Procedures for the Sale of Property Free and Clear of All Liens, Claims and Encumbrances; (II) Scheduling an Auction; (III) Authorizing Entry into the Stalking Horse Purchase Agreement; (III) Authorizing Entry into the Stalking Horse Purchase Agreement; (IV) Approving Assumption and Assignment Procedures; (V) Approving Form of Notice; and (VI) Granting Related Relief; ECF No. 188				
12.	Notice of Proposed Stalking Horse Agreement; ECF No. 197 (executed Stalking Horse Agreement ("SHA") attached at ECF No. 197-1) (with exhibits and attachments, if any)				
12-B.	SHA Exhibit B Special Warranty Deed (executed, with exhibits and attachments, if any)				
12-C.	SHA Exhibit C Seller's FIRPTA Affidavit – Certification of Non-Foreign Status (executed, with exhibits and attachments, if any)				
12-D.	SHA Exhibit D Bill of Sale (executed, with exhibits and attachments, if any)				
12-E.	SHA Exhibit E Assignment and Assumption (executed, with exhibits and attachments, if any)				
13.	Order (A) Approving Asset Purchase Agreement Between the Trustee and QB Loop Property LP; (B) Approving the Sale of the Property Free and Clear of All Liens, Claims, Encumbrances, and Other Interests; (C) Approving Assumption and Assignment of Executory Contracts and Leases; (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases; and (E) Granting Related Relief; ECF No. 608				

Exhibit	Description	Offer	Object	Admit	Disposition
14.	November 18, 2024 Lightfoot Letter to Jetall Companies, Inc., Notice to Vacate, Notice of Eviction, Demand for Possession, Notice of Termination of Leasehold and Reservation of Rights				
15.	November 26, 2024 Letter to 2425 WL, LLC regarding Release of Lien; Sale Order dated July 8, 2024, Docket No. 608 in Case No. 23-34815-JPN				
	Any exhibit identified or offered by any other party.				
	Any exhibit necessary for impeachment and/or rebuttal purposes.				

RESERVATION OF RIGHTS

NBK and NBK's Assignee reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this Witness and Exhibit List before the Hearing.

DATED: December 4, 2024

PILLSBURY WINTHROP SHAW PITTMAN LLP

/s/ Charles C. Conrad

Charles C. Conrad
Texas Bar No. 24040721
Ryan Steinbrunner
Texas Bar No. 24093201
609 Main Street Suite 2000
Houston, TX 77002
Telephone: (713) 276-7600
Facsimile: (713) 276-7634
charles.conrad@pillsburylaw.com
ryan.steinbrunner@pillsburylaw.com

- and -

Andrew M. Troop
Massachusetts Bar No. MA547179
Patrick E. Fitzmaurice*
Kwame O. Akuffo*
31 West 52nd Street
New York, NY 10019-6131
Telephone: (212) 858-1000
Facsimile: (212) 858-1500
andrew.troop@pillsburylaw.com
patrick.fitzmaurice@pillsburylaw.com
kwame.akuffo@pillsburylaw.com

*Admitted *pro hac vice*

Counsel for National Bank of Kuwait, S.A.K.P., New York Branch